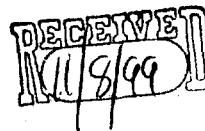


October 19, 1999



Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St., S.W.
Washington, DC 20204

RE: Dietary Supplement Statement of Support Notification

To: Whom It May Concern:

Nutritional Specialties, Inc., 1452 E. Katella Ave. Anaheim, CA 92805, the distributor of the following dietary supplement products, intends to make the following statement of support: "MSM, the major metabolite of DMSO, is an organic sulfur compound, which is important in maintaining healthy tissues. MSM promotes healthy joint function in the formation of connective tissue."

This claim is being made for MSM.

Which is contained in LifeTime® MSM (Methyl-Sulfonyl-Methane) 750 mg Capsules. This submission is being made in compliance with the requirements of 21 CFR 101.93.

The undersigned is an authorized representative of Nutritional Specialties, Inc. and certifies that the information contained in this notice is complete and accurate, and that Nutritional Specialties, Inc. has substantiation that the above statement is truthful and not misleading.

Signature

Full Name

Title

Harry G. Shippey

HARRY AUGUST SHIPPEY

PRES.